

# **EXHIBIT A**

### **Plaintiff's Proposed Schedule for Selenious Acid**

| <b>Event</b>   | <b>Deadline</b>  |
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| Initial Status Conference  | September 9, 2024<br>(Subject to Court's Availability) |
| Exchange Initial Disclosures<br>FRCP 26(a)(1)  | September 13, 2024                                     |
| Disclosure of Asserted Claims<br>L. Pat. R. 3.6(b)   | September 13, 2024                                     |
| Defendants' Invalidity Contentions<br>L.Pat. R. 3.6(c), 3.3<br>L.Pat. R. 3.6(d), 3.4 (b,c)                         | October 16, 2024                                       |
| Defendants' Non-Infringement<br>Contentions<br>L. Pat. R. 3.6(e)   | October 16, 2024                                       |
| Deadline for Amending Pleadings or<br>Joining Parties  | November 8, 2024                                       |
| Plaintiffs' Infringement Contentions<br>L. Pat. R. 3.6(g), 3.1<br>L. Pat. R. 3.6(h), 3.2                           | November 15, 2024                                      |
| Plaintiffs' Responses to Invalidity<br>Contentions<br>L. Pat. R. 3.6(i), 3.4A                                      | November 15, 2024                                      |
| Status Conference  | TBD (Subject to Court's Availability)                  |
| Exchange of Proposed Terms for<br>Construction<br>L. Pat. R. 4.1 (a, b)  | November 22, 2024                                      |
| Exchange of Preliminary Proposed<br>Claim Constructions and Identification<br>of All Supporting Intrinsic Evidence | December 11, 2024                                      |

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| and Designation of Supporting Extrinsic Evidence <sup>1</sup><br>L.Pat. R. 4.2 (a, b)  |                   |
| Exchange and Identification of All Rebuttal Intrinsic and Extrinsic Evidence<br>L.Pat. R. 4.2 (c, d)   | December 18, 2024 |
| File Joint Claim Construction and Prehearing Statement<br>L.Pat. R. 4.3  | December 27, 2024 |
| Any party, if relying upon advice of counsel as part of a patent-related claim or defense for any reason, to produce discovery related thereto for which the attorney-client and work product protection have been waived.<br>L. Pat. R. 3.8 | January 3, 2025   |
| Substantial Completion of Document Production  | January 8, 2025   |
| Opening Claim Construction Briefs<br>L.Pat. R. 4.5(a)  | January 10, 2025  |
| Completion of Expert Discovery Relating to Claim Construction<br>L. Pat. R. 4.5(b)   | January 24, 2025  |
| Responding Claim Construction Briefs<br>L. Pat. R. 4.5(c)  | January 29, 2025  |

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<sup>1</sup> For each disputed claim term, each party shall propose constructions other than “plain and/or ordinary meaning,” without prejudice to the ability to argue that a proposed claim construction comports with the “plain and/or ordinary meaning” of the disputed claim term

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| Submit Proposed Schedule for Claim Construction Hearing<br>L. Pat. R. 4.6   | January 31, 2025  |
| Status Conference   | TBD (Subject to Court's Availability)                       |
| Close of Fact Discovery   | March 21, 2025  |
| Markman Hearing   | TBD   |
| Exchange of Opening Expert Reports on Issues for Which the Party Bears the Burden of Proof<br>(including Plaintiffs' Expert Reports on Secondary Considerations of Non-Obviousness) | April 4, 2025   |
| Exchange of Rebuttal Expert Reports   | April 25, 2025  |
| Status Conference   | TBD (Subject to Court's Availability)                       |
| Close of Expert Discovery   | May 16, 2025  |
| Dispositive Motions   | TBD   |
| Pretrial Submissions  | June 11, 2025   |
| Pretrial Conference   | Week of June 23, 2025<br>(Subject to Court's availability)  |
| Trial   | Week of August 4, 2025<br>(Subject to Court's availability) |
| Simultaneous Post-Trial Brief   | TBD   |